1 The Honorable David G. Estudillo 2 3 4 5 6 7 UNITED STATES DISTRICT COURT WESTERN DISTRICT OF WASHINGTON 8 AT TACOMA 9 WILL CO. LTD. a limited liability company Case No.: 3:20-cv-05666-DGE organized under the laws of Japan, 10 AGREED REQUEST TO RENOTE Plaintiff, 11 PLAINTIFF'S OBJECTIONS TO REPORT AND RECOMMENDATION 12 VS. **DKT. NO. 66** KAM KEUNG FUNG, aka 馮錦鴻, aka 13 FUNG KAM KEUNG, aka FUNG KAM-14 NOTE ON MOTION CALENDAR: KEUNG, aka KUENG FUNG, aka KEUNG September 30, 2022 KAM FUNG, aka KAM-KEUNG FUNG, aka 15 KEVIN FUNG, an individual; FELLOW SHINE GROUP LIMITED, a foreign company, 16 and DOES 1-20, d/b/a AVGLE.COM, 17 Defendants. 18 19 20 AGREED REQUEST TO RENOTE MOTION 21 Subject to approval of this Court, Plaintiff Will Co. Ltd. and Defendants hereby agree 22 and request that Plaintiff's Objections to Report and Recommendations (Dkt. No. 66) be re-23 noted from September 30, 2022 to October 14, 2022. 24 This matter was continued once before, from September 16, 2022 to September 30, 2022 25 (See Dkt. No. 69). This prior re-note sets Plaintiff's reply to Defendants' response due 26 September 30, 2022. Unfortunately, an unforeseen and unexpected family emergency AGREED REQUEST TO RENOTE PLAINTIFF'S FREEMAN LAW FIRM, INC. OBJECTIONS TO REPORT AND 1107 1/2 Tacoma Avenue South RECOMMENDATION DKT. NO. 66-1 [NO. 3:20-cv-Tacoma, WA 98042 05666 DGE1 (253) 383-4500 - (253) 383-4501 (fax)

1 (disclosed to defendants' counsel) kept Plaintiff's counsel out of the office for two days this 2 week. Re-noting to October 14, 2022 is requested as next week is Yom Kippur, a holiday for Plaintiff's counsel's family. 3 The request for re-note the motion is made by agreement among Plaintiff's and 4 5 Defendants' counsel to accommodate Plaintiff's counsel family emergency and is not made for 6 purposes of delay or any other improper purpose. 7 8 DATED this 30th day of September 2022. 9 10 FREEMAN LAW FIRM, INC. 11 s/Spencer D. Freeman Spencer D. Freeman, WSBA # 25069 12 FREEMAN LAW FIRM, INC. 13 1107 ½ Tacoma Avenue South Tacoma, Washington 98402 14 sfreeman@freemanlawfirm.org 15 Attorney for Plaintiff Will Co 16 17 18 /s/ Evan Fray-Witzer Evan Fray-Witzer (pro hac vice) 19 CIAMPA FRAY-WITZER, LLP 20 Park Plaza, Suite 505 20 Boston, Massachusetts 02116 21 Telephone: 617-426-0000 Facsimile: 617-423-4855 22 Evan@CFWLegal.com 23 Attorneys for Defendant 24 25 26

AGREED REQUEST TO RENOTE PLAINTIFF'S OBJECTIONS TO REPORT AND RECOMMENDATION DKT. NO. 66-2 [NO. 3:20-cv-05666 DGE]

FREEMAN LAW FIRM, INC.

1107 ½ Tacoma Avenue South Tacoma, WA 98042 (253) 383-4500 - (253) 383-4501 (fax)